

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

_____)	
JOHN MICHAEL COHAN,)	
)	
Plaintiff,)	Civil Action No. 1:21-cv-15452
)	
vs.)	
)	
STATE OF NEW JERSEY ET AL,)	
)	
Defendant.)	
_____)	

STAY OF PROCEEDINGS


Plaintiff, John Michael Cohan hereby electronically serves this STAY OF PROCEEDINGS to Defendant's attorneys. The Plaintiff requests that the court Stays all Proceedings temporarily, including but limited to the Summary Judgment motion filed by the Defendant based on the following reasons:

1. The criminal matter, State of New Jersey vs. John Cohan is still ongoing since August of 2019, and a trial date has still not been set.
2. Questions of material fact exist due to the criminal matter still being active. If the court does not stay the proceedings, the Plaintiff's civil case may be put in jeopardy. For instance, if the Plaintiff's criminal charges are dismissed or the Plaintiff is found not guilty, this

- could significantly impact the outcome of this case.
3. I request that there is an automatic stay caused by the filings in Berlin Borough and Berlin Township New Jersey Municipal courts.
4. The Defendant will not be substantially harmed if the stay is granted because all material facts will be present after the criminal matter is resolved.
5. The public's interest will be served by granting this stay because all material facts will be present upon the court's decision.

I declare under penalty of perjury under the laws of the State of New Jersey that the foregoing is true and correct.

Respectfully submitted,



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12/19/2022

DATE

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